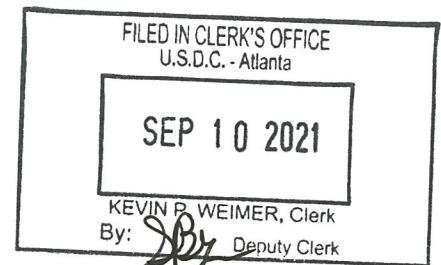


IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION



Robin Gowers

Plaintiff,

v.

HALSTED FINANCIAL SERVICES, LLC,

Defendant.

CIVIL ACTION FILE NO.  
1:21-cv-03203-JPB-LTW

Notice to all I am stating that I am the following: Consumer, Natural Person, Original Creditor, Lender, Executor, Administrator, the holder in due course for any and all derivatives thereof for the surname/given name Gowers-Consumer. I have been appointed and accept being the Executor both public and private for all matters proceeding. I hereby claim that I will d/b/a CONSUMER Gowers and autograph as the agent attorney in fact, so be it. I am not the Trustee of the all caps name listed in the legal documents of this case.

**1. CAUSE OF ACTION**

Cite the U.S. Civil Statue under which you are filing: 15 USC 1692k

Brief description of cause: Violation of my Consumer Rights

Pursuant to 15 USC 1602(e)(g)(1) I am the natural person and the original creditor. The term "person" means a natural person. As the original creditor, The term "creditor" refers only to a person who both (1) regularly extends, I regularly extend, whether in connection with loans, sales of property or services, or otherwise, consumer credit which is payable by agreement in more than four installments or for which the payment of a finance charge is or may be required.

Per the courts observation the Complaint is word-for-word identical due to the cases being linked via the Original debt collector as follows. Pendrick Capital Partners LLC, sold/assigned the account to: Ability Recovery Services LLC, Halsted Financial Services, LLC, Common Wealth Financial Systems and Atlantic Cod Emergency Physicians LLC. For purposes of court record I want it mentioned there is one addition debt collector related to this case but due to not filing against yet I won't list the name of the corporation at this time.

**COMPLAINT**

Halsted Financial Services, LLC and the other debt collectors mentioned above are in violation of my rights as a natural person and consumer pursuant to 15 U.S. Code § 1601(a)(1) - Congressional findings and declaration of purpose

**(a) INFORMED USE OF CREDIT**

The Congress finds that economic stabilization would be enhanced and the competition among the various financial institutions and other firms engaged in the extension of consumer credit would be strengthened by the informed use of credit.

credit card

(l) The term "credit card" means any card, plate, coupon book or other credit device existing for the purpose of obtaining money, property, labor, or services on credit.

\* I the natural person, consumer and original creditor, I extended my credit by use of my credit card for services for the alleged debt. As the consumer I have the right to extend credit and defer any obligations or alleged obligations.

Halsted Financial Services, LLC and the other debt collectors mentioned above are in violation of my rights as a natural person and consumer pursuant to 15 U.S. Code § 1602(p) - Definitions and rules of construction

(p) The term "unauthorized use," as used in section 1643 of this title, means a use of a credit card by a person other than the cardholder who does not have actual, implied, or apparent authority for such use and from which the cardholder receives no benefit.

\*I am the injured party due to the actions and reckless routine business practices of Halsted Financial Services, LLC and the other debt collector(s) mentioned above within this case. My information has been shared with multi unauthorized individuals, unauthorized companies and unauthorized representatives without my prior written consent or acknowledgement. There was no verbal consent granted either. The use of my personal private information has caused me and my family mental stress, financial injures, embarrassing denials, plus higher interest rates. My credit card information was to be used as original instructed when the allege obligation occurred only.

Halsted Financial Services, LLC and the other debt collectors mentioned above are in violation of my rights as a natural person and consumer pursuant to 15 U.S. Code § 1692(a) - Congressional findings and declaration of purpose

(a) ABUSIVE PRACTICES

There is abundant evidence of the use of abusive, deceptive, and unfair debt collection practices by many debt collectors. Abusive debt collection practices contribute to the number of personal bankruptcies, to marital instability, to the loss of jobs, and to invasions of individual privacy.

\*See attached documentary evidence as proof that Halsted Financial Services, LLC and all the debt collector(s) listed above, acted in the role of an debt collector attempting to collect an allege debt. Exhibits presented; statements of alleged debt owed, letters of deletion which by default are an admission of guilt, copies of my credit report which each debt collector reported negative, derogatory, vital information damaging both my character, credit worthiness, reputation, credit standing.

Halsted Financial Services, LLC and the other debt collectors mentioned above are in violation of my rights as a natural person and consumer pursuant to 15 U.S. Code § 1681(a)(2)(3)(4)(b) - Congressional findings and statement of purpose

(a) ACCURACY AND FAIRNESS OF CREDIT REPORTING

The Congress makes the following findings:

(2) An elaborate mechanism has been developed for investigating and evaluating the credit worthiness, credit standing, credit capacity, character, and general reputation of consumers.

(3) Consumer reporting agencies have assumed a vital role in assembling and evaluating consumer credit and other information on consumers.

(4) There is a need to insure that consumer reporting agencies exercise their grave responsibilities with fairness, impartiality, and a respect for the consumer's right to privacy.

(b) REASONABLE PROCEDURES

It is the purpose of this subchapter to require that consumer reporting agencies adopt reasonable procedures for meeting the needs of commerce for consumer credit, personnel, insurance, and other

information in a manner which is fair and equitable to the consumer, with regard to the confidentiality, accuracy, relevancy, and proper utilization of such information in accordance with the requirements of this subchapter.

\*Per my documentary evidence, it is very obvious that there was reckless and careless handling of my consumer rights to privacy. There was no consideration to ensure each debt collector(s) was not reporting and attempting to collect the alleged debt at the same time. All the above mentioned debt collectors are seen reporting negative collection accounts on my consumer reports at the same time.

Halsted Financial Services, LLC and the other debt collectors mentioned above are in violation of my rights as a natural person and consumer pursuant to 15 U.S. Code § 1692 - Congressional findings and declaration of purpose

(d) INTERSTATE COMMERCE

Abusive debt collection practices are carried on to a substantial extent in interstate commerce and through means and instrumentalities of such commerce. Even where abusive debt collection practices are purely intrastate in character, they nevertheless directly affect interstate commerce.

debt

(5) The term "debt" means any obligation or alleged obligation of a consumer to pay money arising out of a transaction in which the money, property, insurance, or services which are the subject of the transaction are primarily for personal, family, or household purposes, whether or not such obligation has been reduced to judgment.

\*As reflected in my documentary evidence, it's apparent that the 3<sup>rd</sup> party debt collectors and the original debt collectors were advertising on my Consumer Credit Report to cause pursuant to 15 U.S. Code § 1681m - Requirements on users of consumer reports adverse action(1) Actions included .— The term "adverse action"— (A) has the same meaning as in section 1691(d)(6) of this title ; and (B) means— (i) a denial or cancellation of, an increase in any charge for, or a reduction or other adverse or unfavorable change in the terms of coverage or amount of, any insurance, existing or applied for, in connection with the underwriting of insurance; (ii) a denial of employment or any other decision for employment purposes that adversely affects any current or prospective employee; (iii) a denial or cancellation of, an increase in any charge for, or any other adverse or unfavorable change in the terms of, any license or benefit described in section 1681b(a)(3)(D) of this title ; and (iv) an action taken or determination that is— (I) made in connection with an application that was made by, or a transaction that was initiated by, any consumer, or in connection with a review of an account under section 1681b(a)(3)(F)(ii) of this title ; and (II) adverse to the interests of the consumer.

Halsted Financial Services, LLC and the other debt collectors mentioned above are in violation of my rights as a natural person and consumer pursuant to 15 U.S. Code § 1692f. Unfair practices- A debt collector may not use unfair or unconscionable means to collect or attempt to collect any debt. Without limiting the general application of the foregoing, the following conduct is a violation of this section:

\*As shown within my documentary evidence, the debt collector(s) are in clear violation of the Consumer Laws mentioned in the previous paragraph. Shown in handwritten notes taken per phone call communications, harassment of threats to mark my consumer credit report negatively to attempt to collect an alleged debt, having my under age grandson's private information of dates of service to the emergency room, reporting derogatory information, which in turn damaged my reputation, my character, my credit worthiness, my credit standing. The repeated injuries I have suffered include denials when I attempt to extend my credit, higher interest rates, embarrassment among my peers, defamation of character.

Halsted Financial Services, LLC and the other debt collector(s) mentioned above are in violation of my rights as a natural person and consumer pursuant to 15 U.S. Code § 1681a - Definitions; rules of construction

**2. PARTIES**

Plaintiff, Robin Gowers-Natural Person and Consumer, resides at address:2385 Surrey Trail, College Park, GA 30349, (Telephone Number) 404-642-9484

Defendant(s), Halsted Financial Services, LLC 8001 Lincoln Ave Ste:500, Skokie, IL 60077

**3. RELIEF:** Briefly state exactly what you want the court to do for you.

Pursuant to 15 U.S. Code § 1692k - Civil liability I am seeking remedy for injuries and damages

(a) AMOUNT OF DAMAGES Except as otherwise provided by this section, any debt collector who fails to comply with any provision of this subchapter with respect to any person is liable to such person in an amount equal to the sum of—

(1)

any actual damage sustained by such person as a result of such failure;

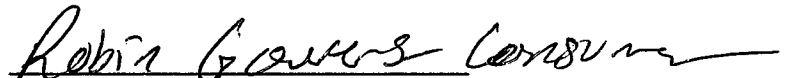
(2)

(A)

in the case of any action by an individual, such additional damages as the court may allow, but not exceeding \$1,000; or

\*Pursuant to 15 USC 1692k Civil Liability, as a natural person, original creditor and consumer. Being aware of my rights to enforce, I am seeking a remedy of judgment as the injured party due to the flagrant violations of my consumer rights under FDCPA, FCRA, ECOA, TILA and my privacy rights under HIPPA laws. I'm seeking a judgment in the amount of \$6,000.00 to be paid by Cashier Check payable to me within 10 days of the judgment being granted.

Signed this 10 (day) of 09 (month), 2021 (year).

  
Signature of Plaintiff(s)



Due to the nationwide impacts of the coronavirus (COVID-19), it may take us longer than usual to answer your call.

We are still processing complaints and you can check the status of an existing complaint online.



Consumer Financial  
Protection Bureau

(<https://www.consumerfinance.gov/>)

◀ All complaints (.)

210422-6450844

CLOSED

✓ Submitted

#### STATUS

Submitted to the CFPB on 4/22/2021

#### PRODUCT

Debt collection

#### ISSUE

Took or threatened to take negative or legal action

**We received your complaint. Thank you.**

We will review your complaint. Depending on what we find, we will typically:

- Send your complaint to the company for a response; or
- Send your complaint to another state or federal agency, or help you get in touch with your state or local consumer protection office; or
- Let you know if we need more information to continue our work.

#### YOUR COMPLAINT

On 4/22/2021 @9:03am est., I received an uninvited and unauthorized call from a Mr. Richard Benning of Halsted Financial Services, LLC, who asked for me by name once I replied that I was who he asked for he stated that he was a debt collector and he was attempted to collect the debt for his client Pendrick Capital Partners, LLC., Mr. Benning continued by stating that he was calling regarding the medical service my 7year old

*Exhibit  
B part  
(1-4)*

RE: Case Number: 210422-6450844 Robin Denise Gowers To Whom It May Concern: This letter is regarding a consumer complaint filed by Robin Denise Gowers against Halsted Financial Services, LLC. Complaints of this nature are very serious and are not taken lightly. We are in receipt of the Consumer's complaint. Our office has placed an immediate cease on any attempts to communicate with the Consumer regarding this matter. Additionally, we will submit a delete request to the credit reporting agencies. I hope that this addresses the Consumer's concerns. If I can be of any further assistance, please do not hesitate to contact me or my office directly by phone at (800) 275-8639 ext. 711 or via e-mail at [bglass@halstedfinancial.com](mailto:bglass@halstedfinancial.com). Sincerely, Brian S. Glass, Esq., CRCP General Counsel Halsted Financial Services, LLC email: [bglass@halstedfinancial.com](mailto:bglass@halstedfinancial.com) PH: (800) 275-8639 ext. 711

#### ATTACHMENTS

[Complaint Response - CFPB.docx \(13.9 KB\)](#)

Exhibit  
B  
Part  
(3-4)



#### Feedback requested

##### STATUS

Feedback requested on 4/22/2021

##### FEEDBACK DUE

6/21/2021

#### Provide feedback about the company's response

We welcome your feedback on how the company responded to your complaint. You will have 60 days from when the company responded to share your feedback. The CFPB will share your feedback responses with the company and use the information to help the CFPB's work with consumer complaints.

[Submit your feedback](#)



#### Closed

The CFPB has closed your complaint.

grandson Isaac Durr had received at piedmont hospital emergency room on Sept. 6. 2018. When I asked Mr. Benning repeatedly how did he happened to have my name and number and how did he have my under age grandson private information concerning his visit to the emergency room. Mr. Benning began to get very frustrated with me and the questions I was asking him, Mr. Benning stated I was wasting time and the call was going nowhere, he also didn't want to provide me with his company's actual address, Mr. Benning stated that he would note on my account my refusal to pay, after I continued to ask Mr. Benning for his company's address he told me to hold on as he was trying to get the address but in turn he just hung up on me!!!!

**ATTACHMENTS**[ab.jpg](#) (3 MB)[Isaac-debt collector.jpg](#) (2.2 MB)[View full complaint](#) +

Exhibit  
B part  
(2-4)

**✓ Sent to company****STATUS**

Sent to company on 4/22/2021

We've sent your complaint to the company, and we will let you know when they respond.

Their response should include the steps they took, or will take, to address your complaint.

Companies generally respond in 15 days. In some cases, the company will let you know their response is in progress and provide a final response in 60 days.

**✓ Company responded****STATUS**

Company responded on 4/22/2021

**RESPONSE TYPE**

Closed with explanation

**Company's Response**



## ADDITIONAL TOOLS AND RESOURCES

Debt Collection (<https://www.consumerfinance.gov/consumer-tools/debt-collection/>)

EXHIBIT B  
(parts 4-9)

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Privacy Act Statement

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OMB #3170-0011

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Note on user experience

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Have a question? ¿Preguntas?

(855) 411-2372



An official website of the United States Government



EXHIBIT A

Richard Benning  
of  
Halsted Financial

4/21/2021 @ 9:03am

Pendrick Capital Partners

Isaac Durr

Violation  
15 USC 1681g  
(b)(1A)

ER 9/6/2018

Called informed he  
was a debt collector  
and was seeking to  
collect a debt for  
my grandson Tyrs old  
had gone to the  
Piedmont hospital  
became frustrated with  
me and also hung up  
on me.

Violation

15 USC 1692a  
(2)(3)

Violation

15 USC 1692c  
(a)

Violation

15 USC 1692c  
(b)(c)

Violation

15 USC 1692d  
(2)(5)

15 USC 1602  
(p)